

COPILEVITZ & CANTER, P.C.

ATTORNEYS AT LAW

423 W. EIGHTH STREET
SUITE 400
KANSAS CITY, MISSOURI 64105
(816) 472-9000 • FAX (816) 472-5000
E-MAIL cckc@aol.com

3 LAFAYETTE CENTER, SUITE 330
1155 21ST STREET, N.W.
WASHINGTON, D.C. 20036-3308
(202) 861-0740 • FAX (202) 331-9841
E-MAIL copcandc@aol.net

PLEASE REPLY TO THE MISSOURI OFFICE

April 28, 1997

Mr. Jose M. Rodriguez
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

VIA FEDERAL EXPRESS

Re: MUR 3774

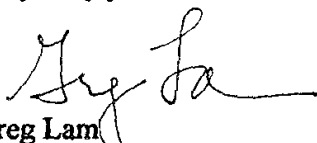
Dear Mr. Rodriguez:

We are in receipt of your correspondence of April 14, 1997, regarding a previous response to a subpoena to produce documents issued by the Commission. While the previous response could have provided a better explanation of the situation, I believe the enclosed statement will afford you a broader idea of the involvement of the Southern Education Council in any individual campaign or election.

The Southern Education Council, et al., had no direct contract or relationship with any specific candidate or candidates, nor did they have any contract or relationship with specific organizations in the promotion of any type of political agenda. The company was hired as a subcontractor a number of times during the period in question by other fund-raising companies, which may have had direct contracts or relationships with such individuals or entities.

As the statement suggests, Southern Education Council does not wish to be uncooperative with your office. They simply do not have the documents or records which you seek. If you can think of a manner in which we might be of assistance, please do not hesitate to contact me.

Very truly yours,


Greg Lam
For the Firm

GL:mas

Enclosure

APR 29
3 32 AM '97
FEDERAL ELECTION
COMMISSION
WASHINGTON, D.C.

STATEMENT

The Southern Education Counsel, Inc. conducted telemarketing in 1994 for a number of organizations. The response to the Subpoena and the Order issued by the Federal Election Commission Encompasses the activities carried on by Southern Education Counsel, Inc. and the Southern Education Counsel Capital Corporation, including all parent and related corporations and entities.

The Southern Education Counsel, *et al.*, (the "organization") are primarily engaged in telemarketing/fund raising for and on behalf of non-profit organizations. At no time was the organization contracted with candidates Rod Grams or Ann Wynn to contact voters on their behalf during the 1994 Senate election in Minnesota. The organization had subcontracted to assist another fund raising firm during this time but have not record of who the parties were or what specific issues were involved. The organization dealt directly with the contracted fund raising firm and made all reports directly to it. There was no need to keep any specific materials covering that subcontracted activity after the date calling terminated. Thus, the representation that the organization has no records regarding any solicitation or calling performed for these candidates (or any candidate for that matter) is accurate.

The organization wishes to cooperate with the Federal Election Commission in whatever manner necessary. All of the Officers and Directors listed in the previous response to the Subpoena and Order have been consulted in that response as well as this Statement.

OATH

I, Scott Pasch, President of Southern Education Counsel, Inc. do hereby state affirm that the statements made herein are true and correct to the best of my knowledge and belief.